

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

JOHN DOE, aka D.C.C.,  
Defendant.

Cr. No. 1:21CR23MSM-LDA

In violation of 42 U.S.C. § 408(a)(7)(B), 18  
U.S.C. § 1347, 18 U.S.C. § 1028A, 18  
U.S.C. § 641, 18 U.S.C. § 1015(e), 18  
U.S.C. § 1544

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE: 42 U.S.C. § 408(a)(7)(B)**  
**(False Representation of Social Security Number)**

The Grand Jury charges that:

On or about March 19, 2018, in the District of Rhode Island, JOHN DOE, aka D.C.C., defendant herein, falsely represented, with intent to deceive and for any purpose, a number to be the social security account number assigned by the Commissioner of Social Security to him, on an application for a Rhode Island identification card, when in fact such number is not the social security account number assigned by the Commissioner of Social Security to him.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

**COUNT TWO: 18 U.S.C. § 1347**  
**(Health Care Fraud)**

The Grand Jury further charges that:

From on or about January 1, 2016 through on or about January 24, 2021, in the District of Rhode Island and elsewhere, JOHN DOE, aka D.C.C., defendant herein, knowingly executed and attempted to execute a scheme and artifice to defraud and to obtain money and property owned by, and under the custody and control of a health care benefit program, to wit RItE Care benefits in the total approximate amount of \$39,023.61, in connection with the delivery of and payment for health care benefits, items and services.

All in violation of Title 18, United States Code § 1347.

**COUNT THREE: 18 U.S.C. § 1028A(a)(1)**  
**(Aggravated Identity Theft)**

The Grand Jury further charges that:

From in or about January 1, 2016 and continuing to approximately January 24, 2021, in the District of Rhode Island and elsewhere, JOHN DOE, aka D.C.C., defendant herein, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, Health Care Fraud, in violation of 18 U.S.C. § 1347, knowing that the means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT FOUR: 18 U.S.C. § 641**  
**(Theft of Public Money)**

The Grand Jury further charges that:

From on or about March 22, 2017, through on or about May 13, 2020, in the District of Rhode Island and elsewhere, JOHN DOE, aka D.C.C., defendant herein, willfully and knowingly did steal, purloin, and convert to his use, on a recurring basis, money belonging to the United States and any department and agency thereof, in a total amount greater than \$1,000, to wit: Supplemental Nutrition Assistance Program benefits paid by the United States Department of Agriculture, having a value of approximately \$7,342.64.

All in violation of Title 18, United States Code, Section 641.

**COUNT FIVE: 18 U.S.C. § 1015(e)**  
**(False Representation of Citizenship)**

The Grand Jury further charges that:

On or about March 19, 2018, in the District of Rhode Island, JOHN DOE, aka D.C.C., defendant herein, with the intent to obtain on behalf of himself, a State benefit and service, to wit, a Rhode Island identification card, did knowingly make a false statement and claim that he is a United States citizen.

All in violation of Title 18, United States Code, Section 1015(e).

**COUNT SIX: 18 U.S.C. § 1544**  
**(Misuse of Passport)**

The Grand Jury further charges that:

On or about March 22, 2017, in the District of Rhode Island and elsewhere, JOHN DOE, aka D.C.C., defendant herein, willfully and knowingly used and attempted to use a United States passport, in violation of the conditions and restrictions therein contained and of the rules prescribed pursuant to the laws regulating the issuance of passports, in that the defendant used a fraudulent passport to obtain money and property owned by, and under the custody and control of a health care benefit program.

All in violation of Title 18, United States Code, Section 1544.

A TRUE BILL:

  
Grand Jury Foreperson

RICHARD B. MYRUS  
United States Attorney

  
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PAUL F. DALY, JR.  
Assistant U.S. Attorney

  
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SANDRA HEBERT  
Assistant U.S. Attorney  
Criminal Division Chief

Date: 3-5-21